

FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 20463

June 11, 2008

Anna Burger, Treasurer
Service Employees International Union
Committee on Political Education (SEIU COPE)
1800 Massachusetts Ave NW
Washington, DC 20036

Response Due Date: July 14, 2008

Identification Number:

C00004036

Reference:

March Monthly Report (2/1/08-2/29/08)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. Failure to adequately respond by the response date noted above could result in an audit or enforcement action. Additional information is needed for the following 4 items:

- 1. Schedule D supporting Line 10 of your report discloses debts incurred this period totaling \$175,000 owed to "SEIU (General Fund)" for apparent independent expenditures. In memo text you state, "obligation for estimated expenses of \$55,000 reported 2/29 and \$120,000 of the total \$420,000 estimate reported 2/25 that were not paid as of 2/29." However, a MEMO Schedule E has not been provided for the 2/29 expense totaling \$120,000. Please be advised that if a communication is aired in one reporting period and the payment is made in a later reporting period, the independent expenditure should be reported as a memo entry on Schedule E when the communication is publicly disseminated and on a Schedule D if it is a reportable debt under 11 CFR § 104.11. Subsequently, when the payment for the independent expenditure is made, the report should show a payment on Schedule E and the same payment on Schedule D, if applicable. Please amend your report to clarify this apparent discrepancy or provide clarifying information regarding the nature of this debt.
- 2. Schedule A supporting Line 15 of your report discloses an offset to an operating expenditure(s) totaling \$5,000 and \$2,263.74 from "Moveon.org Political Action" and "Wisconsin State Council, SEIU," respectively;